



File Code: 1900

Date: February 28, 2019

Dear Forest User,

The Whitman Ranger District invites you to comment on the proposed Patrick Vegetation Management Project (Patrick). The Forest will be preparing an environmental analysis to record and disclose the environmental effects of a proposed action to improve forest health, the landscape's resiliency to disturbance, and increase the structural complexity and species diversity of vegetation to provide habitat for a wider range of wildlife species in the Patrick project area. The following link will direct you to electronic versions of the scoping letter and maps: <https://www.fs.usda.gov/project/?project=55477>

Patrick is located on the Whitman Ranger District of the Wallowa-Whitman National Forest (WWNF), Baker County, Oregon in portions of the following Legal Descriptions:

Table 1

Township	Range	Sections
9S	35 1/2E	25, 35, 36
9S	36E	27, 28, 31-35
10S	35 1/2 E	1-4, 9-16, 21-28, 33-36
10S	35 E	1, 11-14, 21, 23-28, 34-36
10S	36E	1-12, 14-23, 36-35
11S	35 1/2 E	1-3, 12
11S	36E	3-11, 13-18, 20-28, 34-36
11S	37E	30, 31
12S	36E	1,2
12S	37E	6

The area being evaluated is approximately 48.794 acres on National Forest System lands. The majority of the project is located in North Fork Burnt River (48.753 acres) with small portions in the Bridge Creek-Middle Fork John Day River (17 acres), Granite Creek (16 acres), Camp Creek-Middle Fork John Day River (6 Acres) and Phillips Lake-Powder River (2 acres) watersheds. The project area lies approximately 3 air miles southwest of Sumpter, Oregon and approximately 21 air miles southwest of Baker City, Oregon.

The project area is allocated under the Wallowa-Whitman Land and Resource Management Plan (Forest Plan) to approximately 46 percent Timber Production Emphasis (Management Area 1), 22 percent Wildlife/Timber Summer Range (MA 3A), 21 percent Wildlife/Timber Winter Range (MA 3), 7 percent Old Growth Preservation (MA 15), 3 percent Timber Production Emphasis/Winter Range (1W) and less than 1 percent Anadromous Fish Emphasis (MA 18).



## PURPOSE OF AND NEED FOR ACTION

Generally, the purpose and need is represented by the difference or “gap” between the area’s existing condition and its desired condition based on Forest Plan management direction. More specifically, the purpose and need for action is generated by conditions within the analysis area, which have departed from the historic range of variability (HRV), creating conditions that have an increased vulnerability to uncharacteristic levels of disturbance severity.

HRV represents the expected range of tree species, tree density and forest structure under natural, unmanaged disturbance patterns. An analysis of existing vegetation indicates these forest characteristics have shifted away from HRV over the past few decades. Fire exclusion and historic harvest methods which removed high value trees are likely major contributors to this shift away from HRV. This departure away from HRV is the basis for determining the purpose and need for treatment. Based on the difference between the current conditions of the area and the desired future conditions, the purpose and need of this project is outlined below:

- ❖ **Purpose and Need 1: Increase landscape resiliency to risk of uncharacteristic disturbance by moving conditions toward HRV.**

**Forest Vegetation** - In order to compare the existing condition to HRV forest vegetation is delineated into potential vegetation groups (PVG). The PVG concept is simply an aggregation of plant association groups delineated by similar environmental conditions or regimes in combination with dominant plant species. Each PVG is typically composed of plant association groups that occur as a result of the predominant influence of temperature or moisture (Powell 2012). Table 1 below exhibits the current distribution of potential vegetation groups across the project area.

Table 2

Forested Potential Vegetation Groups	Acres	Percent of the forested landscape	Predominant Tree Species
Dry Upland Forest (DUF)	33,421	78	Ponderosa pine, Douglas-fir, western larch, and grand fir
Moist Upland Forest (MUF)	3,305	8	Ponderosa pine, Douglas-fir, western larch, lodgepole pine, and grand fir
Cold Upland Forest (CUF)	6,095	14	Subalpine fir, lodgepole, pine, grand fir, western larch, Douglas-fir

The majority of the Patrick project area is in the dry upland forest PVG. The Moist Upland Forest PVG within the project area primarily consists of small forested patches surrounded by the Dry Upland PVG resulting in a mix of similar species across both the DUF and MUF vegetation groups. Therefore, the response and vulnerability to disturbance is expected to be similar to the Dry Upland PVG. The Cold Upland PVG within the project area consists of a more consolidated forest type primarily located along the southwest border of the project area bordering the Malheur National Forest.

**Landscape/stand structure** - HRV data analysis (see table below) in the Patrick project area shows declining landscape diversity. The single story structure classes such as Old Forest Single Stratum (OFSS), Stem Exclusion (SE) and Stand Initiation (SI) are all below HRV. In particular SI which accounts for canopy openings and OFSS which accounts for stands of single canopy, larger old trees are well below HRV levels.

Although OFSS is predicted to be the most abundant stage under HRV it is almost completely absent within the project area. Conversely, multi-story forest structure such as Understory re-initiation (UR) far

exceeds the amount expected under historic ranges. Old Forest multi stratum (OFMS) is the only structural stage that is currently within HRV.

**Table 3**

Existing Structural Class Compared to HRV										
PVG	SI %	HRV %	SE %	HRV %	UR %	HRV %	OFSS %	HRV %	OFMS %	HRV %
CUF	6	20-45	5	10-30	75	10-25	0	5-20	15%	10-25
MUF	2	20-30	4	20-30	79	10-20	0	10-20	15%	15-20
DUF	4	15-25	5	10-20	76	5-10	0.3%	40-60	15%	5-15

Percentages represent portion of forested land within the project area by PVG (Powell 2014).

**Tree Species Composition** - Species composition within the Patrick project area has changed considerably from HRV. There is an overabundance of shade-tolerant grand fir and Douglas-fir on portions of the landscape. Increases in these species escalates susceptibility to defoliating insects, root and stem disease, and high intensity crown fire. Western juniper has also been increasing throughout the analysis area.

There are scattered patches of quaking aspen throughout the entire project area. Overall the aspen stands are in decline across the project area due to conifer encroachment, fire exclusion and browsing by ungulates. Aspen stands provide habitat for a wide variety of bird species, especially primary cavity nesters.

Table 4 below exhibits the existing species composition by shade tolerance groupings compared to HRV. Overall there is a lack of shade intolerant cover types throughout all three Potential Vegetation Groups present within the project area. Cold and Dry Upland PVGs have an abundance of shade tolerant cover types and the Moist Upland PVG has an abundance of intermediate shade tolerant cover types.

**Table 4**

Potential Vegetation Group (PVG)	Shade-intolerant Dominant Species Composition		Intermediate-tolerant Dominant Species Composition		Shade-tolerant Dominant Species Composition	
	Existing %	HRV %	Existing %	HRV %	Existing %	HRV %
Cold upland forest	36	40-60	0	5-20	63	25-50
Moist upland forest	21	30-60	63	20-40	16	10-30
Dry upland forest	33	75-90			67	5-20

**Tree Density.** The Dry Upland Forest PVG (78% of the forested lands within the project area) within the Patrick project area has an overabundance of overly dense, closed canopy stands and a corresponding deficiency of open density stands in comparison to HRV. Stands with an estimated canopy cover of 40% or greater in the DUF PVG are considered to be in a closed canopy or highly stocked condition. Data analysis indicates that approximately 56% of the forested lands within the Dry Upland PVG are currently in a closed canopy condition. In contrast, only 44% of the forested land in this PVG is in an open condition compared to the estimated HRV range of 80-90% that should have open canopy or low stocking.

The HRV threshold for canopy cover that is used to delineate open versus closed canopy conditions for the cold and moist upland PVGs is 60%. A canopy cover of 0 to 59% is considered to be open or have low stocking while a canopy cover of 60% or greater is considered closed canopy or highly stocked. Under this threshold both the Cold and Moist PVG forest types currently show an abundance of open canopy and a deficit of closed canopy compared to HRV (see table 5). However, as stated above the spatial arrangement of the Moist Upland and Dry upland PVGs has resulted in a very similar mix of species and environmental conditions. Therefore, the higher canopy cover threshold of 60% may not be completely relevant for the actual conditions on the ground. Approximately 66% of the Moist Upland PVG currently has a canopy cover level above the 40% threshold used to evaluate the surrounding Dry Upland PVG. Similarly, approximately 75% of the Cold Upland PVG has a canopy cover over 40%. In addition, the majority of the Cold Upland PVG consists of even aged stands dominated by small diameter lodgepole pine. Although these stands are highly stocked from a trees per acre perspective the smaller crown size results in a lower level of canopy cover that may not completely capture the actual stocking conditions. High tree densities suppress diameter growth, support high intensity crown fire, reduce forage, reduce plant diversity, reduce the rate of large tree development, and increase susceptibility to insects and disease. Portions of the landscape have severe infections of dwarf mistletoe in either one or more tree species including: Douglas-fir, ponderosa pine, lodgepole pine and western larch.

Table 5 below exhibits the proportion (on an acreage basis) of each PVG that is currently in a closed versus open condition in comparison to the proportions predicted through HRV analysis.

**Table 5**

Vegetation Cover Condition	Percent of Dry Upland Forest PVG		Percent of Cold Upland Forest PVG		Percent of Moist Upland Forest PVG	
	HRV (%)	Existing (%)	HRV (%)	Existing (%)	HRV (%)	Existing (%)
Open	80-90	44	20 - 30	64	30 -40	68
Closed	5-20	56	65 - 80	36	60 - 80	32

Existing canopy cover percentages were derived through analysis of Light Detection and Ranging (LIDAR) data with the exception of approximately 1% of the area that was not covered by LIDAR. Aerial photo interpretation was utilized for these additional acres. Dry upland forest closed canopy is 40 percent canopy cover or greater. Cold and moist upland forest closed canopy is 60 percent canopy cover or greater.

**Riparian Vegetation** - Conditions in riparian areas have also moved away from the historic vegetation composition and structure. Shade intolerant hardwoods, shrubs, grasses and forbs are declining principally as a result of conifer competition that has occurred as a result of fire exclusion and browsing by ungulates. Fuel loads are generally high, resulting in a high risk of losing key ecosystem components such as streamside trees, down wood and snags in an uncharacteristic fire. A high intensity fire would also increase erosion potential. Restoration of these areas is important to support populations of riparian-dependent communities of plant and wildlife species.

**Insect and Disease** - The forest vegetation characteristics described above strongly influence the presence of various insects and disease as well as the level of disturbance they create across the forested landscape. As these forest characteristics move away from HRV the level of disturbance and overall affects to the forested environment increases. The elevated stocking levels, increase in multi canopy structure and a shift in species composition to more shade tolerant, less resilient tree species increases the susceptibility to large scale disturbance. The following insect and diseases have been observed and documented within the project area through multiple site visits by staff of the Blue Mountains Forest Insect and Disease Center.

- Elevated Mountain pine beetle activity primarily in lodgepole pine.
- Elevated fir engraver populations within grand fir.
- Dwarf mistletoe in Douglas-fir, western larch and to a lesser extent in the ponderosa pine.
- Occurrence of Heterobasidion root disease in both grand fir and ponderosa pine.
- Indian Paint Fungus in grand fir.
- Increase in multi canopy stand structure enhancing the spread and increasing the threat of foliar insects and diseases such as spruce budworm, and dwarf mistletoe.

**Wildfire** - Northeast Oregon has a high wildfire occurrence rate, primarily due to lightning activity that occurs during the summer and fall months. The Wallowa-Whitman National Forest has one of the highest wildfire occurrence rates in Oregon and Washington. The project area has experienced 204 documented wildfire starts from 1970 through 2017. Lightning caused 74 percent of the fires (151 fires), with human causes (campfires, smoking, debris burning, equipment use or children) accounting for 24 percent of the fire starts (48 fires), and the remaining 2 percent (5 fires) are considered unknown/other. Fires have occurred as early as May and as late as November within the project area, with the largest number of fires occurring in July and August (61% combined). The largest wildfire recorded in the project area between 1970 until 2017 time frame is 15 acres. Seventy eight and four tenths percent (78.4%) (160 fires) of the fires were contained at ¼ acre or less, twenty and one tenth percent (20.1%) (41 fires) were contained between ¼ and 10 acres, and one and five tenths percent (1.5%) (3 fires) were contained between 10-15 acres. No wildfires over 15 acres have occurred in the project area since 1970. From 1985 until 2017, twenty three wildfires over 100 acres have occurred within 10 miles of the project area in similar stand and fuel types.

Large wildfires within 5 miles of the project area within the same timeframe were:  
 1986-Huckleberry fire (8586 acres), Eagle fire (293 acres) and Sunflower fire (8020 acres)  
 1994-Reed fire (2338 acres)  
 2005-Burnt River #152 (163 acres) and Burnt River #154 (269 acres)  
 2015Vinegar fire (1214 acres)

Due to the spatial arrangement of vegetation types across the project area (78% DUF surrounding small scattered pieces of MUF and CUF) fire severity, frequency and return intervals will typically have little variance from what would be expected within the Dry Upland Forest PVG. However, in order to effectively analyze the existing condition and compare to historical conditions, each PVG is evaluated separately. Within the Dry Upland Forest areas and the intermixed/adjacent MUF and CUF, low to mixed severity fires would have historically maintained stand densities at appropriate levels, as well as kept surface fuel loadings appropriate for the stands across the project area. With the exclusion of wildfires due to suppression activities as well as past harvest activities, the majority of the project area is currently modified from historical normal and have higher stand densities and fuel loadings, which will allow fire intensities to be significantly higher than desired historic levels. This has been shown by the nearby Cornet/Windy (2015), Rail (2016), Dooley Mountain (1989) and Huckleberry (1986) fires that all had similar stand types and conditions and burned with high intensities and severities.

❖ **Purpose and Need 2: Reduce threat of Wildfire to local communities within the Wildland Urban Interface (WUI)**

**Wild Land Urban Interface** - The Baker County Community Wildfire Protection Plan (CWPP) has identified the rural communities of Whitney, Greenhorn, Woodtick Village/Rattlesnake Estates, and Sumpter/McCully Forks as communities at high risk to wildfire. These communities are within Wildland /

Urban Interface (WUI) areas that are adjacent to and within the Patrick project area. Factors that were used to assess the risk to these communities were structural vulnerability to wildfire, fire occurrence history, topography, fuels, weather and values at risk.

WUI areas were identified around communities at risk to identify and prioritize projects to reduce the risk to wildfire. The Patrick project area completely encompasses the Whitney WUI area, and contains portions of the Sumpter/McCully Forks WUI area, Greenhorn WUI area, and Woodtick Village/Rattlesnake Estates WUI. These three WUI areas not only have a portion of the project area within in them, but also have larger areas adjacent to the project area. The proposed action will accomplish objectives identified in the CWPP.

- ❖ ***Purpose and Need 3: Increase structural complexity and species diversity of vegetation to provide habitat for a wider range of wildlife species within the project area.***

**Wildlife Habitat** - As described above, the Patrick project area has an abundance of multi-story forest and a low proportion of stand initiation and old forest single-story structural stages. A landscape with HRV components (tree species, tree density and forest structure) within historic ranges would provide a broad spectrum of wildlife habitat components. Addressing high tree densities within stands, and increasing the structural complexity and species diversity of vegetation in both upland and riparian areas would provide habitat for a wider range of wildlife species. Conversely, the proposed actions may impact elk security habitat by decreasing canopy cover in some areas, resulting in a potential loss of hiding cover.

- ❖ ***Purpose and Need 4: Contribute to local economy and provide a supply of forest products to the public.***

Due to the rural and relatively geographically isolated nature of Baker County and surrounding areas the economic stability of this region is somewhat volatile and dependent on local industries such as timber management and production of wood products from public lands. The Patrick project would promote landscape restoration using methods, such as timber harvest and non-commercial thinning. These activities would provide employment opportunities as well as a supply of materials, including saw logs, to local and regional markets. Wood products play an important role in the local and regional economies by providing employment and revenue. Revenues generated through wood products can also help offset the high costs of restoration.

## **PROPOSED ACTION**

The Whitman Ranger District proposes the Patrick Vegetation Management Project to improve forest health and sustainability by promoting the restoration of a resilient forested landscape, diverse riparian forests, aspen stands, meadows and large trees.

The proposed action would manage landscape/stand structure, tree density, and tree species composition to improve the landscape's resiliency by reducing the severity of disturbance. The proposed action would reduce competing ground, ladder and canopy vegetation and reintroduce the natural role of low intensity fire. Riparian Habitat Conservation Areas would also be restored by careful thinning and fuels reduction to improve the growth of vegetation and lower wildfire risk. These actions benefit fire and riparian dependent forests, plants and wildlife. Actions would lower the risk of moderate to high intensity wildfires to nearby communities and private properties while improving public and fire fighter safety, as well as providing a supply of forest products to the public and local markets.

The proposed action would also improve wildlife habitat. Thinning overstocked stands and creating forest openings will increase the amount of forage available for game and other species that utilize early seral habitat. Creating more single-story stands will provide habitat for species dependent on open forest types such as the white-headed woodpecker. Treatments in riparian areas would reduce conifer density, allowing an increase in woody species such as aspen, cottonwood, willow, alder, and dogwood. These species provide forage for game species as well as structure for nesting birds.

Project implementation could begin in 2021 and could continue for approximately 10 – 15 years. Following is a description of the types of treatments being evaluated within the Patrick project area to achieve the purpose and need. The silviculture treatments listed below would improve the landscapes resiliency by creating or maintaining conditions that would reduce the risk of large scale high intensity fire, outbreaks of bark beetle and defoliating insects, spread and intensification of disease, decline of quaking aspen, and the decline of riparian vegetation.

Both noncommercial/pre-commercial and commercial thinning would employ ecologically based methods including variable density and group selection prescriptions, as well as skips and gaps that provide for diversity within stands and on the landscape.

**Non-commercial Thinning-** Noncommercial thinning (NCT), using chainsaws, would reduce tree density, improve trees species composition, and increase single story structure in stands by removing some trees less than 10 inches diameter at breast height (dbh). NCT frequently produces debris accumulations that must be reduced by piling and/or burning. As market conditions dictate this debris may be utilized as fiber. Approximately 14,555 acres are in need of this treatment method.

**Pre-commercial Thinning-** Pre-commercial thinning (PCT), is essentially the same activity as the non-commercial thinning listed above, but will take place within designated commercial harvest units after the harvest activities have been completed. This treatment is designed to reduce stocking and disease in the understory, protect residual large trees from fire by removing ladder fuels and promoting early seral shade intolerant species. Approximately 20,005 acres are in need of this treatment method.

**Commercial Thinning from Below/Group Selection-** Timber harvest would be used to reduce tree density, improve trees species composition, and increase single story structure in trees larger than 7 inches diameter at breast height (dbh). Timber harvest would produce saw timber and, as markets conditions dictate, fiber. Both ground based and cable yarding systems would be utilized. Approximately 21,150 acres are in need of treatment using commercial harvest.

**Post and Pole Thinning** - Post and pole treatments would be utilized to treat smaller diameter stands which would produce a post and pole product. The average size of trees utilized for post and pole material are 8 to 10 inches in diameter at breast height (dbh). These units would be designated within lodgepole pine stands which consist of pure lodgepole pine stands and stands dominated by lodgepole pine with a minor component of other conifer species such as western larch or grand fir. The objective of treatment would be to reduce stocking levels and increase variability of age classes as well as species diversity. Species such as western larch would be favored for retention in these units.

The life cycle of lodgepole pine is typically driven by disturbance (mountain pine beetle and wildfire) creating even aged patches varying in size dependent on the scale of the previous disturbance. As stands reach an average diameter of 6 inches or greater, have high stocking rates and near the age of 80 years old the threat of stand mortality as a result of mountain pine beetle attack greatly increases. Treatments would focus on breaking up the even age patches, reducing stocking rates and creating widely spaced open grown conditions. This would be accomplished by creation of openings of 1 to 5 acres in size in combination with thinning to a relatively wide spacing (at least 40 feet) and reducing overall stocking

down to the lower management zone for lodgepole pine. Approximately 1,170 acres are in need of this treatment method.

**Defensible Fuel Profile Zone (DFPZ)**- Defensible Fuel Profile Zones are strategically placed treatments along identified roads where tree densities, canopy base heights, surface fuel loadings and ladder fuels are reduced, in order to modify fire behavior and provide a safe place for firefighters to initiate fire suppression activities. Reduction of tree densities, base heights, ladder and surface fuels within the DFPZ's provide a location that a wildfire would not be able to carry through the overstory canopy, would have limited ladder fuels to create crown fires, and surface fuel loadings would produce fire intensities that would be generally confined to a surface fire where firefighters would have a high likelihood of stopping the fire spread safely. DFPZ treatments will be a combination of commercial harvest, NCT/PCT and prescribed burning dependent on the existing condition of vegetation. Treatments would resemble the adjacent commercial and noncommercial treatments with greater emphasis placed on tree spacing and crown separation (minimum of 25 feet dependent on crown size) as well as reduction of ground and ladder fuels. The width of the DFPZ will vary dependent on terrain and fuel type with a maximum width of 300 feet from either side of the road it is established on.

Approximately 1,210 acres are in need of commercial thinning within the identified DFPZ area. The NCT and PCT acres in need of treatment within the DFPZ are captured above under the NCT and PCT headings. Also see Table 6 below for delineation of acres by treatment type. Approximately 37 miles of road have been identified as having a need for DFPZ designation and implementation of associated treatments.

**Mechanical slash/debris Treatment** – Debris accumulations, both created and pre-existing, that exceed the desired levels would be reduced by machine piling on slopes less than 30%. Approximately 30,317 acres would need machine piling.

**Prescribed Fire** – Prescribed burning would be used to; reduce debris, manage tree density, and to return fire to portions of the landscape that have missed one or more fire cycles. Prescribed fire would occur when weather and fuel conditions are appropriate to meet the objectives and prescriptions for each unit. Fire managers would select areas to be burned that optimize natural smoke dispersion and minimize local exposure to adverse smoke impacts. Fire control lines would include roads, natural barriers and brush removal rather than bare mineral soil line construction where possible. Approximately 36,032 acres are in need of prescribed fire. Burning would be accomplished over the next 10 - 15 years.

**Riparian Vegetation Restoration** – As per USDA Forest Service. (1995). Interim management direction establishing riparian, ecosystem and wildlife standards for timber sales (INFISH/PACFISH), each stream within the project area has an associated Riparian Habitat Conservation Area (RHCA) that varies in size dependent on the stream category. This project is proposing commercial treatments within the outer portions of the designated RHCAs and NCT treatments throughout the RHCAs in order to improve overall vegetation conditions of the riparian system. General definitions of stream categories are described below:

Category 1: Fish-bearing streams

Category 2: Permanently flowing non-fish bearing streams.

Category 3: Ponds, lakes, reservoirs and wetlands greater than 1 acre (none present in project area)

Category 4: Seasonally flowing or intermittent streams, wetlands less than 1 acre, landslides, and landslide prone areas.

The increase in coniferous tree species has resulted in a reduction of hardwood brush and tree species within some riparian areas. Combinations of non-commercial thinning, commercial harvest, and



prescribed fire would be used to meet the desired condition of each area selected for treatment. No treatment buffers for commercial harvest would be implemented for all stream channels. The width of the no treatment buffers will vary from 75 and 100 feet (on either side of stream) for category 2 and 1 streams respectively. In addition, harvest activities would only take place above an existing road outside of the no treatment buffers. There will be no commercial harvest within the RHCA on category 4 streams. A ten foot no treatment buffer from the edge of the stream bank would be implemented for all NCT activities regardless of stream category. Some trees may be felled and left on site to improve large down wood and to reduce ungulate browse pressure. There are approximately 427 acres in need of commercial thinning and 3,301 acres in need of NCT/PCT treatments within the identified riparian areas. These acres are included within the total commercial treatment and PCT/NCT acres in Table 6 as well as the acres listed above for these treatment categories. Prescribed fire would be allowed to back into RHCA's from adjacent units, but there would be no active ignition related to prescribed fire within the RHCA.

**Old Forest Treatment** – Old Forest Multi-stratum stands comprise approximately 6,499 acres of the Patrick project area. Majority of these acres are within overly dense stands that are being invaded by shade tolerant trees from adjacent stands, as well as by western juniper. Fuels accumulations from litter and bark fall are high, resulting in greater risk of high-severity fire and competition from dense understory trees. Treatments are necessary to reduce live and dead fuels to reduce the severity of future disturbance. Old trees and large live trees (21 inches in diameter and greater), and all snags that do not pose a safety hazard would be retained. While some of these stands could be changed from Old Forest Multi-stratum to Old Forest Single stratum structure, Old Forest Multi-stratum would be retained within the Historic Range of Variation. There would be no net loss of Old Forest in these stands. Approximately 2,924 acres of OFMS are proposed for commercial treatments.

**Old Forest Preservation Stands (MA15)**– There are approximately 3,636 acres of MA15 stands within the project area. No commercial harvest will take place within the MA15 stands. Approximately 2,564 acres of MA15 stands have been identified as having a need for non-commercial thinning and prescribed burning in order to reduce fuel loads and increase resiliency to stand replacement fire. Approximately 1,072 acres of MA15 stands will not receive treatment.

**Roads** – No construction of new specified roads is proposed for this project. Approximately 40 miles of temporary use roads may be constructed to facilitate project implementation. These roads would be designed to limit soil disturbance and would be rehabilitated following use. In addition, currently closed roads, or non-system roads on existing road templates, would be re-opened. These roads would be re-closed and returned to their pre-use condition after management activities have been completed. Rehabilitation of temporary roads may include masking/obliterating entrances, subsoiling, culvert removal, utilizing excavator bucket teeth to loosen compacted soils, recontouring cuts and fills, hydrologically stabilizing, seeding, and/or placing fine slash or other organic materials over treated surfaces to establish effective ground cover protection where available. See the attached "Roads Project Design Criteria" for information about road maintenance and reconstruction, roadside hazard trees, and rock sources.

**Aspen Restoration** – There are currently 6 aspen enclosures of various sizes within the project area that have been previously identified and managed for restoration purposes. These patches were fenced for protection from browsing and managed with various methods intended to enhance regeneration. Success with respect to enhancing regeneration within these previously managed areas is variable. These areas will be evaluated for further management in the form of prescribed burning, thinning of over story aspen, fence maintenance and thinning of conifer seedlings. In addition there are 6 other aspen stands have been identified for restoration. To reverse aspen decline competing conifers would be reduced using non-commercial thinning and/or commercial harvest. Where necessary, sites would be protected from

ungulate browse pressure until the aspen grow above browse height. Acreage for these treatments are included within the total treatment acres calculated below in table 6.

Table 6

<b>Proposed Action Total Treatment Acres</b>	
<b>Treatment Type</b>	<b>Acres</b>
<b><i>Commercial Harvest</i></b>	
Thin From Below/ Group Selection	21,150
Post and Pole Harvest	1,170
DFPZ Treatment	1,210
<b>Total</b>	<b>23,530</b>
<b><i>PCT &amp; NCT Treatment</i></b>	
PCT	18,985
DFPZ-PCT	1,020
NCT	13,719
DFPZ-NCT	836
<b>Total</b>	<b>34,560</b>
<b><i>Prescribed Burning</i></b>	
Post-Harvest Burning	17,660
Post PCT/NCT Burning	9,876
Stand Alone Burning	8,496
<b>Total</b>	<b>36,032</b>

## HOW TO COMMENT

Those of you who are interested in the Patrick Vegetation Management Project are encouraged to become involved in the planning process by providing us with comments and suggestions. In order to be eligible to participate in the Objection process (36 CFR 218), written comments must be received by April 3, 2019. Specific written comments should be within the scope of the proposed action, have a direct relationship to the proposed action, and must include supporting reasons for the responsible official to consider. These comments will be used to resolve issues and develop additional alternatives. Comments that you provide on this project will become a matter of public record.

Written comments must be submitted to: Kendall Cikanek, Whitman District Ranger, 1550 Dewey Ave., Suite A, Baker City, OR 97814, or email to [comments-pacificnorthwest-wallowa-whitman-whitmanunit@fs.fed.us](mailto:comments-pacificnorthwest-wallowa-whitman-whitmanunit@fs.fed.us), or FAX-541-523-1965. The office business hours for those submitting hand-delivered comments are: 8:00 a.m. to 4:30 p.m. Monday through Friday, excluding holidays. Please be sure to include Patrick Vegetation Management Project as the subject for your written comments. Electronic comments must be submitted in a format such as an email message, plain text (.txt), rich text format (.rtf), or Word (.doc). Oral comments must be provided at the Responsible Official's office during normal business hours via telephone 541-523-6391 or in person at the street address above. Comments received, including the names and addresses of those who comment, will be considered part of the public

record for this proposal and will be available for public inspection (Authority: 40 CFR 1501.7 and 1508.22; Forest Service Handbook 1909.15, Section 21).

If you have any questions, additional information can be provided by contacting Roy Cuzick, Silviculturist at [rdcuzick@fs.fed.us](mailto:rdcuzick@fs.fed.us) or (541) 523-1327.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kendall Cikanek", with a horizontal line extending from the end of the signature.

KENDALL CIKANEK  
District Ranger

Enclosures: Roads Project Design Criteria, Vicinity Map, Treatments Map